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July 18, 2023

VIA ECF

The Honorable Georgette Castner, U.S.D.J.
U.S. District Court for the District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street, Room 2020
Trenton, NJ 08608

Re: *Federal National Mortgage Association v. Ocean Grove NJ, LLC et al.* (3:23-cv-03554-GC-TJB)

Dear Judge Castner:

This Firm represents Plaintiff Federal National Mortgage Association ("Fannie Mae").

The above-captioned action was filed on June 30, 2023 against Defendants Ocean Grove NJ LLC, Ocean Grove Operating LLC, and Sage Home Management LLC (collectively, "Defendants"). (ECF No. 1). It was accompanied by an Order to Show Cause seeking the immediate appointment of a receiver. (ECF Nos. 3, 5).

This letter is to advise the Court that all Defendants have been served and affidavits of service have been filed on ECF. (ECF Nos. 7-9). Although Defendants' counsel have not yet appeared, the undersigned has forwarded them the Complaint and Order to Show Cause.

The property underlying this foreclosure action is a senior living facility. Plaintiff believes that time is of the essence in appointing a receiver because of serious ongoing safety concerns involving the residents. The New Jersey Department of Health recently imposed a substantial fine on the facility's current operator after a resident was permitted to wander away because of insufficient supervision.

We are available for a hearing on the Order to Show Cause at the earliest available opportunity for the Court.

Respectfully,

/s/ Brian Farkas
Brian Farkas

Cc (via email): Counsel for Defendants